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## **MEMORANDUM**

November 30, 2018

TO:

The Commission

THROUGH: Alec Palmer

Staff Director

FROM:

Kate Higginbothom MAH

Acting Deputy Staff Director Management & Administration

SUBJECT:

Updated Corrective Action Plan for Offices of Human Resources Audit

The attached Corrective Action Plan (CAP) has been updated to show the progress the Office of Human Resources (OHR) has made since the last update. Since the last update in May 2018, OHR has completed corrective actions to close two outstanding recommendations. With assistance from HR Solutions, OHR has been able to close Recommendations 22 and 24, both of which concern the FEC's recruitment and selection processes. OHR is currently working on corrective actions to close the three remaining audit recommendations.

Please feel free to contact me if you have any questions.

Thank you.

## 2013 Audit: OIG 12-05 Corrective Action Plan - Created November 2014, Last Updated November 2018 Follow Up Official: Kate Higginbothom, Acting Deputy Staff Director for Management & Administration

FINDING Performance Management	RECOMMENDATION	FEC MANAGEMENT PLAN	FEC PROJECT LEAD	ESTIMATED COMPLETION DATE	MGMT STATUS & COMMENTS as of 11-30-2014	as of August 2018	OIG COMMENTS Updated as of August 2018	CAP Response November 2018
Ineffective Leadership								
There continues to be a breakdown in communication.	Recommendation 1: OHR Management should reevaluate methods used to communicate expectations, to give feedback on staff performance, and to promote and address feedback from OHR staff in order to identify meaningful solutions to improve the organization. Then, OHR Management should make it a priority to implement corrective actions.	(1) The OHR Management team (Director and two Supervisory Human Resource Specialists) hold daily "standup" staff meetings to ensure communication and awareness of daily/weekly priorities. (2) OHR holds a weekly staff meeting for the purpose of reviewing work priorities and strengthening communication and team collaboration. During OHR staff meetings, each staff member discusses issues on her plate and what steps she is taking to resolve them. The team discusses issues on ways to resolve it or schedules separate meetings to discuss the issue is complex or time-consuming. (3) OHR management will hold two team building sessions and use part of weekly staff meetings to continue promotting collaboration, process improvement and customer service.		Weekly. (3) 8/15 and 8/29/2013; (4) 8/12/2013	(8/29/2013) (4) Completed (8/12/2013)	Closed	(1), (2) OIG confirmed with Acting Director of OHR that daily and weekly team meetings are held. (3) OIG confirmed that the two team building sessions were held on 8/15 and 8/29/2013. (4) OIG confirmed that all OHR staff performance plans were developed for 2014 plan year and include specific individual responsibilities and expectations.	
	Recommendation 2: OHR Management should make a clear distinction between the roles of the Director of OHR and the two supervisors who are responsible for supervising their subordinates on a daily basis. In addition, the roles and responsibilities for each OHR member should be clearly	(1) The OHR Management team holds daily "stand-up" staff meetings to ensure communication and awareness of daily/weekly priorities. (2) 2014 OHR performance plans will be revised to include metrics that layout clear expectations and increase staff accountability. (3) OHR will hold a team meeting on August 29 to redefine			(1) Completed and ongoing. (2) Completed (8/12/2013); (3) Completed on 8/29/13	Closed	OIG reviewed 2014 performance plans for all current OHR staff members. OIG confirmed that performance plans include specific roles and responsibilities for each person and the plans were completed and signed in Aug. 2014. Also, OIG confirmed meetings are held to clarify roles and responsibilities. This recommendation is closed.	
	Recommendation 3: The FEC should pursue a detail or other type of agreement with another federal agency to bring on board, no less than six months, a seasoned IfR professional with significant experience in federal government HR operations, management and customer service, to provide clear direction, training, and focus to improve the HR office.	The Deputy Staff Director for Management detailed a SES candidate (at no cost to the Commission) to help with the issues as part of his development assignments. In addition, the Deputy Staff Director for Management and Administration assumed the managerial role of the OHR for the months of May and June and conducted team meetings on a weekly basis in order to strengthen team morale, staff collaboration, and improving customer service. The	Mitra Nejad	9/30/2013	Completed. Candidate started a 120-day detail on June 3, 2013. The Candidate has also developed a work plan that addresses many of the recommendations identified in the OIG audit.	Closed	The OIG confirmed that the SES candidate's detail ended in September 2013. OIG reviewed the work plan developed by the SES candidate, the status of work plan items completed, and the SES candidate's overall assessment document. OIG notes that OHR has already implemented or is in the process of implementing some of the recommendations by the SES candidate. OIG concludes that actions taken has addressed this recommendation. Therefore, this recommendation is closed.	

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3	Inadequate Office Structure								
1		Recommendation 4: OHR Management should reassess the new OHR office structure to determine if there is a need to adjust the functions/tasks between the two teams, and/or individual team members, in order to better balance the workload amongst the teams/team members.	(1) OHR Management is reviewing the HR structure to determine its efficacy. OHR structure, roles and responsibilities will be discussed with the OHR staff at the August 29th OHR team session. (2) Following this session, OHR management will decide what, if any, changes to the office structure will be made, including identification of back-ups to ensure consistent service delivery.	Judy-McLaughlin, Dayna Brown, and Sandra Labissiere	(2) TBD	(1) Completed 8/29/2013 (2) DHR hired 18 May 14. DHR reviewed OHR structure and submitted request for hire to Personnel Committee on 2 Sep 14. Request included hiring, minor restructuring, and minor upgrades to	Closed	The OHR staff has been realigned and is currently fully staffed with 9 FTEs. This recommendation can be closed.	
:	Noncompliance with FEC's Performance Plan and Appraisal Policy								8
1		Recommendation 5.: Ensure all HR staff has detailed performance plans that include their specific tasks and goals for their HR position.	(1) 2014 OHR performance plans will be revised to include metrics which provide clear expectations and increase staff accountability. (2) OHR will ensure that 2014 performance	Judy McLaughlin, Dayna Brown, and Sandra Labissiere		(1) Completed (8/12/13); (2) Completed (8/12/13)	Closed	OIG reviewed 2014 performance plans for all current OHR staff members. OIG confirmed that performance plans include specific roles/tasks and responsibilities for each person and the plans were completed and signed/approved in Aug. 2013.	
	1	Recommendation 6: Ensure all performance plans are properly reviewed and approved by the first and second line supervisors in accordance with the annual	OHR will adhere to FEC-wide performance management guidelines and deadlines regarding performance plans, mid-year reviews and annual ratings.	Judy McLaughlin, Dayna Brown, and Sandra Labissiere		Completed FY2013 (8/12/2013) and ongoing	Closed	See OIG response to recommendation 5 above.	
	Mid- year reviews were not timely for three OHR staff members. Mid- year reviews were not adequately documented for all HR staff members, including the Director of HR.	Recommendation 2: Ensure that all staff completes the required self assessment for the mid-year and year-end performance review.	OHR will adhere to FEC-wide performance management guidelines and deadlines regarding performance plans, mid-year reviews and annual ratings.	Judy McLaughlin, Dayna Brown, and Sandra Labissiere		(1) Completed FY2013 (8/12/2013) and ongoing. (2) OHR staff received appraisals end of FY14. Planning and appraisals on track.	Closed	The OlG confirmed mid-year self assessments as well as annual performance appraisals were completed for all OHR staff. This recommendation is closed.	
		Recommendation 8: Ensure that the mid-year review discussion is documented and signed off by the employee and supervisor in accordance with the annual	OHR will adhere to FEC-wide performance management guidelines and deadlines regarding performance plans, mid-year reviews and annual ratings.	Judy McLaughlin, Dayna Brown, and Sandra Labissiere	1/31/2014	Completed FY2013 (8/12/2013) and ongoing	Closed	OIG reviewed mid-year reviews and confirmed that there was documentation to evidence mid-year review discussions were held. This recommendation is closed.	
		Recommendation 9: Ensure all required sections of the annual performance appraisal process are completed, discussed and properly reviewed by the due dates specified	OHR will adhere to FEC-wide performance management guidelines and deadlines regarding performance plans, mid-year reviews and annual ratings.	Judy McLaughlin, Dayna Brown, and Sandra Labissiere	beyond	(1) Completed FY2013 (8/1/13) and ongoing, (2) OHR staff received appraisals end of FY14. Closed	Closed	The OIG confirmed mid-year self assessments as well as annual performance appraisals were completed for all OHR staff. This recommendation is closed.	

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	Technology and Automation								
1	Ineffective Use of FHR System								
	ineffective Use of Frix System	Recommendation 10: Fully implement the FHR modules to the maximum extent feasible to improve the effectiveness and efficiency of the OHR by December 2013.	(1) A specific and detailed project plan will be developed to fully implement FHR modules. (2) HR will pilot the rollout to a test group of managers and external HR users prior to full implementation. (3) HR staff performance plans will be amended to require full utilization of FHR Navigator. (4) HR will fully implement FHR.	Judy McLaughlin, Dayna Brown, and Sandra Labissiere	10/18/2013; (3) 8/12/2013 (4) 1-/17/2014 6/30/14 (5) 1 Mar 2015	(2)Completed roll out implemented in phases-providing access to the following organizations: CFO - 3/12/2014 RAD: by 4/30/2014 OGC by 5/31/2014 SD by 6/30/2014 (3) Completed 8/12/2013 (4) Completed 8/12/2013 (4) Completed 8/12/2013 initiated Lean Six Sigma project to improve OHR customer service. Complete review of HR On Demand, FHR and Remedy will streamline process for OHR and Agency personnel. Recent addition of Training and		OIG was informed that as of July 15, 2016 OHR has implemented the following FHR modules (Recruitment and classification, retirement and benefits, case tracking, and data connectivity). OIG met with Director of OHR on July 15, 2016 where he presented a system demonstration verifying that the recruitment and classification, retirement, and case tracking modules have been implemented. This recommendation is closed.	
	FHR modules are not fully implemented and integrated with NFC.	Recommendation 11: Establish an agreement with the Information Technology Division (ITD) to have an ITD staff member(s) assigned to the HR office to aid in any technical issues with project implementation.	ITD already provides OHR assistance with IT-related technical matters on a project-specific and ongoing basis. OHR will continue to request ITD assistance depending on the scope of a given project and level of technical assistance needed.	Judy McLaughlin	Completed	[1] Completed. Requests for assistance will be sent to the IT HelpDesk to be tracked by Remedy and will be assigned to the appropriate IT staff person. (2) No need for formal agreements. Each OHR project includes IT collaboration and support. Examples include shared services discussion, OHR		OIG notes that Management does not believe a formal agreement with ITD or a formal planning document for OHR IT projects are necessary. Per Director of OHR, collaboration between OHR and ITD is on-going which has led to a successful upgrade of OHR's FECNet site, implementation of FHR hiring module, performance mgmt module, training software, and Remedy. Director of OHR also stated that OHR is currently planning to coordinate with OCFO and ITD to evaluate the possibility of an HR LOB.  Based on OIG review of current status of technical developements relating to OHR IT projects, we conclude that corrective actions have adequately addressed this recommendation and can be closed.	
		Recommendation 12: Develop and implement a template planning document guide prior to a) purchasing a new system; b) implementing/revamping a system (internal or external); or c) acquiring services (service provider HRLOB, interagency agreements, etc.) that details: a. the needs of the office; b. services/benefits that will be received (ex: fully meets objectives, cost savings, etc.); c. any affects (positive/negative) to other offices that could be impacted or benefit from consultation; d. costs to the agency, both start-up and ongoing: e. alternative solutions (if any); I. implementation dates/milestones and	require a new system, it will proceed with these recommended steps.	Judy-McLaughlin-	FY 2014	For OHR development of IT solutions, we collaborate extensively with IT, CFO and SD to determine solutions that provide most effective outcome at most responsible cost. As an example, we have made extensive use of outside networks to discuss the best HRLoB that meets OHR and OCFO needs. We have been slow and methodical in determining the best solution. Additionally, OIG does not have template for IT purchases to offer as are example of the		See response to Recommendation 11 above.	

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В		Recommendation 13: Identify one HR staff member who will be the owner/manager of the content for HR's FECNet page and revise their annual performance plan to reflect their duties and responsibilities for maintaining the content of HR's FECNet page.	(1) OHR Management will assign an HR staff member to serve as the project manager responsible for updating and maintaining the OHR FECNet page. (2) Add FECNet responsibilities to assigned OHR staff performance plan.	Judy McLaughlin	8/12/2013	(1)Completed (6/3/2013) Cathy Lee- Amos, Human Resource Specialist, has been assigned as the OHR FECNet page project manager. (2) Completed: These duties have been added to Ms. Lee-Amos' FY	Closed	The OIG confirmed that the 2014 performance plan for the OHR staff member assigned as the project manager for OHR FECNet page has been updated to to reflect these specific duties and responsibilities. This recommendation is closed.	
	OHR is not effectively utilizing or maintaining its FECNET page.	Recommendation 14: Update all content on HR's FECNet page by September 2013 to ensure all information is accurate, up-to-date, and relevant.	OHR FECNet project manager will be responsible for maintaining and updating the page, as necessary.	Cathy Lee-Amos	9/30/2013	The OHR FECNet page has already been updated such that links work and information is accurate and relevant. Cathy Lee-Amos is responsible for working with ITD to maintain the page, to continue to update the page with relevant information, and to notify ITD of any	Closed	OIG viewed OHR FECNet site confirming that the page has been updated and site links are now working. This recommendation is closed.	
		Recommendation 15: Establish an agreement with ITD to have an ITD staff member(s) assigned to the OHR to aid in any technical issues with developing HR's FECNet page.	ITD already provides OHR assistance with IT-related technical matters on a projects-specific and ongoing basis. OHR will continue to request ITD assistance depending on the scope of a given project and level of technical assistance needed.	Judy McLaughlin		(1) Completed. Requests for assistance will be sent to the IT HelpDesk to be tracked by Remedy and will be assigned to the appropriate IT staff person. (2) No need for formal agreements. Each OHR protect includes IT collaboration and support. Examples include shared services discussion, OHS	Closed	The OIG confirmed that prior technical issues with the FECNet site has been resolved. Also, OHR has designated one staff person to be responsible for the FECnet page and this responsibility has been added to their performance plan. OIG concludes that corrective actions have addressed this recommendation. Therefore, this recommendation can be closed.	2
c	Electronic Fingerprint Scheduling Process not Fully Implemented	Recommendation 16: Fully implement the electronic fingerprint scheduling process and notify CORs that it is available.	OHR will assess the Lotus-Notes based finger print scheduling system identified in the OIG Report and revise the process, where necessary, to make it more efficient and effective for OHR and stakeholders, such as CORs and managers. OHR will notify CORs and managers of the scheduling process. OHR assessed the current processed used for scheduling fingerprints and badges and decided to create specific time periods when employees can come to OHR to get fingerprints and badges done. These time periods will be posted conspicuouly in OHR and FECNet.	Dayna Brown	1/2/2014 5/15/14 (FY 2017)	(4)-12/13/2014— Posting of time periods- for fingerprints and- badges-and-the process- with Staffing shortages and influx of hiring and recruiting requests, date has been extended to 5/15/14 (2) ORR has been attempting to work with IT since October. Our intent it to set-up a means of allowing CORs to schedule fingerprints in amaner similar to the way employees reserve conference rooms. The COR would schedule an appointment via the Lotus Notes calendar, their request would come to all OHR for someone to approve and once we approve it a confirmation of the date and time would go to the COR. Once we can get together with IT to build this, we will write the procedures as well as days and fines.	F	The OHR has fully implemented an on-line electronic appointment scheduling system (Timetrade) in June 2017 which is used to electronically schedule both fingerprinting and badging appointments. The OIG has confirmed that the electronic scheduling system is operating effectively. This recommendation is closed.	
	0	Recommendation 17: Develop a policy and procedures that documents and instructs how to us the electronic fingerprint scheduling tool.	HR will create a procedural guide and upload it on its FECNet site and e communicate it to staff.	Dayna Brown	1/2/2014	(1) See Management action plan to recommendation 16, as	Closed	The OHR finalized and forwarded the SOP for the new electronic appointment scheduling system in June 2017. Therefore, this recommendation is closed.	

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111	Office Operations								
	HR on Demand is ineffective.	Recommendation 19: Once the Remedy customer request tracking system is implemented, OHR Management should determine the most effective way to use the automated system to improve the HR On Demand process and leverage the new system to streamline other related processes and procedures. In addition, this new process along with other related processes should be formally documented in a policy and/or standard operating procedures (SOP). The policies/SOPs should clearly document each OHR members' role and responsibilities, as well as details about the technical and operational components of the processes.	(1) Management will work with ITD to create reports to monitor the effectiveness of Remedy and monitor timeliness of responses to customer inquiries. (2) Management will document procedures in an SOP. (3) HR staff will collaborate on best practices, categories, and identifying primary and alternate responsibilities.	Lauren Lien	2019	Completed - (1) ITD developed and submitted a monitoring report on 8/13/2013 (2) In July 12, 2013, HR Management developed and disseminated written procedures on using Remedy for HR staff during staff meeting, by email, and uploaded on ECM. (3) Completed (8/16/13), (4) DHR initiated Lean Six Sigma project to improve OHR customer service. Complete review of HR On Demand, FHR and Remedy will streamline process for OHR and Agency personnel. Remedy is not being used and has been		The OIG was informed by the Director of OHR that OCIO is still exploring a new online correspondence tracking system called Service Now to replace the Remedy System /HR On Demand. Until a new system or an effective tool to track and monitor the timeliness of customer inquiries has been fully implemented, this recommendation can not be closed.	OHR will work with OCIO to implement ServiceNow as a replacement system for HR inquiry tracking and monitor the timeliness of customer inquiries.
		Recommendation 20: Management should ensure the entire OHR staff is adequately trained on how to use the new Permedia successor requires tracking.	All OHR staff will receive training on Remedy.	Judy McLaughlin	8/15/2013	Completed: OHR staff were trained on July 12th and a makeup training was completed on August 1	Closed	The OlG confirmed that all current OHR staff members have been trained on the new Remedy system. This recommendation can be closed.	

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В	Non-compliance with FEC's Recruitment/Selection Process	Recommendation 21: The recruitment and selection checklist should be completed by the HR Specialist as each step in the process is completed for each position filled. The completed recruitment and selection checklist should be maintained in the related VA file.	(1) OHR will revise the recruitment and selection checklist to accommodate changes due to the implementation of FHR Navigator. (2) HR Specialists will be required to use the revised recruitment and selection checklist and will maintain it as part of the relevant vacancy file for each vacancy posted.	Cathy Lee-Amos	10/18/2013 1/31/2014 1/3/2015 (FY 2017)	(1) Note, date is postsponed to 1/31/2013 file to furlough and hirring freeze. (2) DHR initiated Lean Six Sigma project to improve speed to hire. Complete review will streamline all hirring processes, improve ability to attract talent, assist managers in their	Closed	The OHR has converted to the USA Staffing automated system which follows the standard OPM 80 day hiring model. The new system utilizes workflow and automatcially tracks each vacancy according to the OPM 80 day hiring model and stores all applicable forms and documentation. Therefore, this recommendation can be closed. is a wris in the process of reviewing the processes and procedures related to recruitement and hiring. Any necessary changes, updates to related checklists and SOPs will be made accordingly. Once the OIG can confirm the hiring process has been reviewed, revised, fully implemented and SOP documented as needed, this recommendation can be closed.]	
		Recommendation 22: The Supervisory HR Specialist (HR Supervisory HR Specialist (HR Supervisor) responsible for the recruitment and selection process should be required to review each VA file to ensure the proper documentation is included in the file and that every step on the recruitment and selection checklist has been completed. Once reviewed the HR Senior Specialist should sign off on the checklist indicating that the VA file is complete and that the recruitment and selection policy and procedures was adhered to.	(1) Management will revise SOP on recruitment process, (2) ensure case files are created and maintained in compliance with applicable laws, rules, and policies, (3) appropriate staff will be trained or get refresher training, where necessary, and as budget permits.	Dayna Brown	1/31/2014 5/30/14 1 Mar 2015	Note-date-is-postponed to 1/31/2013 fue		See comment for Recommendation #21 above. The OHR is in the process of updating service level agreements, and related checklists and SOPs based on the new system. Once the OIG can confirm the related SOPs and documents have been finilazed this recommendation can be closed.	
		Recommendation 23: OHR should conduct adequate oversight for all OGC positions and ensure all documentation is completed and included in applicable files.	OHR Management will partner with OGC management to ensure proper compliance	Cathy Lee-Amos		(1) Completed and ongoing, OGC has had upstone posting (14-008 (Internal) Asst General Counsel-Admin Law) w/ which OHR partnered and monitored. Partnership will continue as OGC has additional recruitments. (2) OGC has posted additional vacancies in the latter quarter of FY14. OHR has worked closely with the OGC Recruitment POC to ensure that all steps have been followed as required. None of these vacancies is at the poin of selection as of yet, however, OHR will be thoroughly reviewing	е	OIG was informed that OHR currently initiates the hiring process for all OGC positions by completing the vacancy announcement information in the FHR system, performs initial screening of candidate applications to ensure minimal requirements are met, and oversees the OHR selection process (crediting plans, rating and ranking, interviewing). The OIG sampled 4 OGC job openings and received supporting documentation confirming that the OHR currently completing the initial screening of applicants for minimal qualifications. In addition, the OIG noted two of the four job postings contained additional evidence that OHR and OGC collaborated on finalizing the crediting plan for the rating and ranking stage of the hiring process. OIG conclude that this recommendation can be closed.	

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		Recommendation 24: Management should implement Office of Personnel Management (OPM) guidance which states "develop and use a 'Hiring Contract' between the hiring manager and the Human Resources Office that spells out each party's responsibility for filling the job" The recruitment and selection checklist included in the OHR SOP for recruitment could be utilized as the hiring contract and this checklist should be reviewed with the hiring official at the beginning and throughout the recruitment and hiring process to discuss timelines and expectations.	(1) Management will revise SOP on recruitment process, (2) HR Specialists will be required to utilize and adhere to the revised SOP on recruitment, including the checklist (3) appropriate staff will be trained or get refresher training, where necessary.	Cathy Lee-Amos	1/31/2014 5/30/14 1 Mar 2015 (FY 2017)	Note, date is-postponed-to-1/31/2013 fue to- furlough and hiring- freeze.  (1)With Staffing shortages, influx of hiring and recruiting requests and newly utilitzation PER recruitmetn module for hiring activities, date has been extended to 5/30/14;  (2)Ongoing With influx of recruitment requests, HR is creating and maintaing case files. Casefile checklist has been created to highlight case requirements and monitor compliance (3) Staff have attended the following training: Category Rating, Classification for Non- Classifiers, Processing Pederal Personnel Actions, Personnel Security and Ajudication (4) DHR initiated Lean Six Sigma project to improve	Closed	The OHR has created a new service level agreement for the recruitment had hiring processes and have distributed to all Managers. The service level agreement will be implemented for any new hirings initiated after June 2017? The OIG will verify once this recommendation has been fully implemented.	
c	Outdated Global Personnel Policies / Directives	-			V V	on and to blue			
	All of OHR's current policies in place have not been updated to reflect current practic es, and policies that have been updated to reflect current practice have not been finalized and approved by the Commission	relevant, and update as needed.	policies to Commission or Staff Director for approval, as appropriate, (2) Team Supervisors will ensure SOPs for HR areas under their purview are updated as needed	Lauren Lien & Hope Hanner- Bailey		(1) HR Policies and procedures will be reviewed and/or revised during FY 2014. Thus far, OHR has prepared updated draft Hiring and Training policies and procedures will be reviewed further upon hiring of new HR Director. (2) New DHR reorganizing all HR policies to allow more frequent updates and better procedural approach. Plan to incorporate wiki tools to improve agency.	×	The Director of OHR has performed an assessment of all personnel related policies and procedures that either exist need revised or created and has created an road map to address. Actions have been taken to begin updating creating the necessary documents. To date, the retirement SOP, new fingerprintingSOP, and the hiring service leverl agreement have been completed. Actor, OHR is in the process of identifying all HR/personnel related policies, directives, and SOPs and determining which documents needs to be revised, rescinded, and/or created to comply with current regulations/laws/guidance. The OIG will verify once this recommendation has been fully implemented.	OHR continues to work with OPM's HR Solutions to draft and update SOP's and policies. OHR is also prioritizing and reviewing existing agency policies and SOPs. OHR will update policies when we are notified of changes in the law. For SOPs and policies that do not change as frequently, OHR plans to set a schedule where a third of the policy documents are updated. And accessed
		Recommendation 26: All policies and procedures should be posted in a central location accessible to all FEC staff (ex. FECNet, the FEC computer server). In addition, when policies and procedures are updated they should be reposted and an email sent to all FEC staff on the changes/updates.	Once policies are approved by the Commission and/ or Staff Director, they will be posted on the HR FecNet site and ECM.	Hope Hanner- Bailey	FY 2020	(1) See recommendation 25. Policies/procedures will be updated as policies are approved. (2) Redundant with #25. New DHR policies to allow more frequent updates and better procedural approach. Plan to incorporate wiki tools to improve agency visibility of all oprocedures. Working	Open	The OIG will verify once this recommendation has been fully implemented.	OHR will create a library of updated SOPs on the FEC network as work is completed so that staff can access the most updated wersions of policies and SOPs.